

Subject: INFORMATION: Access to Emergency Exits Date: MAY 29, 1991


From: Manager, Transport Airplane Directorate,
Aircraft Certification Service, ANM-100


To: SEE DISTRIBUTION

We have recently become aware that there may be some confusion in the field regarding Type III exit access requirements for transport airplanes with 19 or fewer seats. The regulations allow different access provisions for Type III exits in smaller and larger airplanes, with some latitude given to the smaller airplanes if the effectiveness of the exit is not reduced. Specifically, for airplanes of 20 passengers or greater, § 25.813 requires that there be no interference in opening the exit, and that the projected opening of the exit provided be unobstructed. For the smaller airplanes, there could be some minor obstructions, provided that they do not reduce the effectiveness of the exit. Throw-type pillows have frequently been used in this application, and are considered acceptable if they do not impede opening the exit. In either case however, the exit must be openable, by untrained persons, from the inside and the outside.

Interior features (galleys, closets, seats etc.) must not prevent an exit from being opened. For example, an adjustable seat that can translate into the exit opening such that the exit is not openable, is not acceptable. Procedural considerations, such as placarding the seat to be in a specific position for takeoff and landing, are not considered sufficient. Seats should have a positive design feature that prevents them from being moved into positions which render an exit unopenable.

If there are questions regarding this guidance, please contact Frank Tiangsing, FTS 392-2121, or Jeff Gardlin, FTS 392-2136.

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for Jeff Gardlin

Concur: 
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